

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

AMERICAN ALLIANCE FOR
EQUAL RIGHTS,

Plaintiff,

v.

Case No. 3:23-cv-01877-L

PERKINS COIE LLP,

Defendant.

DECLARATION OF CAMERON T. NORRIS

I, Cameron T. Norris, declare as follows:

1. I am over the age of 18, of sound mind, and otherwise competent to sign this declaration.

2. I am a partner at Consovoy McCarthy PLLC representing the American Alliance for Equal Rights in this case.

3. The Alliance seeks a preliminary injunction against Perkins Coie LLP regarding its diversity fellowships. The Alliance offers several exhibits to support that motion.

4. Exhibit A is a true and correct copy of a website entitled “Diversity Recruitment and Retention” as it appeared on August 25, 2023. That website can be accessed at perma.cc/36ER-BEHB.

5. Exhibit B is a true and correct copy of a website entitled “1L Opportunities” as it appeared on August 20, 2023. That website can be accessed at perma.cc/T3XZ-NUC8.

6. Exhibit C is a true and correct copy of a website entitled “2L Opportunities” as it appeared on August 20, 2023. That website can be accessed at perma.cc/5HNZ-38LW.

7. Exhibit D is a true and correct copy of a website entitled “Law Students” as it appeared on August 28, 2023. That website can be accessed at perma.cc/Y4XC-XCHV.

8. Exhibit E is a true and correct copy of a website entitled “About our Summer Program” as it appeared on August 20, 2023. That website can be accessed at perma.cc/3AEW-V9TR.

9. Exhibit F is a true and correct copy of the declaration of Edward Blum.

10. Exhibit G is a true and correct copy of the declaration of Member A.

11. Per 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2023

/s/ Cameron T. Norris
Counsel for Plaintiff

Exhibit A



Diversity Recruitment and Retention

We believe in developing relationships and investing in people. At Perkins Coie, we strive to create a diverse and inclusive community where opportunities to succeed are available to all.

Our firm culture is built on collaboration and mutual respect. Once an attorney becomes part of our community, we want him or her to feel welcome and prepared to participate at every level of engagement necessary for success. This is why the firm supports resource groups for women, parents, lesbian, gay, bisexual and transgender attorneys, lawyers with disabilities, and lawyers of color (African American/Black, Latinx, Asian American/Pacific Islander and South Asian/Middle Eastern). In order to increase the number of diverse backgrounds and perspectives within the firm, these resource groups offer opportunities for fellowship, support and networking. In addition, local office diversity committees offer programs and events that respond to the specific and unique needs of their communities, while the firm as a whole also hosts national programs and retreats aimed at providing diverse attorneys with the information and tools they need to succeed.

Demographics: The 2023 Summer Class

Overall:

- 66% Racial/Ethnic diversity
- 30% White
- 62% Women
- 38% Men
- 15% LGBTQ+

Breakdown of racial/ethnic diversity:

- 1% American Indian or Alaska Native
- 13% African American/Black
- 22% Asian American/Pacific Islander
- 13% Hispanic/Latinx
- 17% Multiracial

Note: Individuals may be included in more than one category.

Perkins Coie 1L and 2L Diversity Fellowships

Since 1991, the 1L Diversity Fellowship program has paved a steady road to change by opening the door for students from communities historically underrepresented in the legal industry to experience practice at a large law firm. The program provides each diverse law student a \$15,000 academic scholarship and paid summer associate position.

In 2020, Perkins launched its 2L Diversity Fellowship that began with the firm's 2021 summer program. In support of our recruitment goals, Perkins Coie is pleased to offer a \$25,000 fellowship to historically underrepresented 2L students. The \$25,000 fellowship is paid to 2L recipients in two parts: the first following successful completion of the summer program and the second upon accepting an offer to join the firm following graduation.

Recruitment Activities and Programs

Our recruitment efforts include building supportive relationships with organizations, hosting job fairs, and offering programs designed to educate and expose students to the legal profession. In addition, we host an annual summer associate retreat that provides an opportunity for all summer associates firmwide to gather for three days of substantive programming and networking, followed by a full day of social engagement.

Annual Summer Associate Retreat: The retreat helps associates successfully navigate the summer experience and learn best practices for developing key traits of successful lawyers, as well as highlights the importance of diversity, equity, and inclusion as core firm values. Members of firm leadership, partners, counsel, and associates serve as panelists and speakers to provide varied perspectives and illustrate the myriad paths to advancement at Perkins Coie.

Retention Programs and Activities

Perkins Coie recognizes the importance of retention in promoting diversity, and is proud of its efforts to support and invest in the many diverse attorneys across the firm through various retention programs and initiatives.

Our retreats are a crucial retention tool strategically designed to provide members of our affinity groups unique opportunities to build organic relationships while in a professional development environment. They are also integral in engaging our diverse lawyers, who learn from and collaborate with one another, and share varied perspectives. Perkins Coie is especially proud of both the All Women Lawyers Retreat and the Lawyers of Color/LGBTQ+/Lawyers with Disabilities Biennial Retreat.

All Women Lawyers Retreat: The retreat provides an opportunity for the firm's women attorneys to focus on strategies for professional advancement, ways to improve collegiality, and the value of each woman's unique perspective. It also serves as an opportunity for participants to network with other attorneys from all levels, offices and practice groups within the firm, and to share best practices on navigating the law firm culture. The presentations and events offered at this two-day retreat provide the participants with various tools to help advance their career. This two-day retreat typically hosts 200+ women attorneys.

Lawyers of Color/LGBTQ+/Lawyers with Disabilities Retreat: This retreat brings together many of the firm's diverse attorneys to discuss, embrace, and celebrate diversity in an inviting environment. Many of the retreat's sessions and presentations are open to attorneys of all levels, with tracks specific to the programming that coincides with where the attorney currently is in their career. This distinction allows for time focused on professional and business development skills particular to the career stage of the attorneys. In addition to the networking opportunities provided at different presentations and mixers, attendees also have the opportunity to meet other diverse lawyers in their specific practice groups and create new and build upon existing relationships.

For questions, please contact Diversity&Inclusion@perkinscoie.com.

National Career Fairs and Conventions

Our recruitment efforts include building supportive relationships with student organizations, job fairs and programs designed to educate and expose students to the legal profession. We encourage all law students, regardless of whether they plan to apply to Perkins Coie, to speak with us so that we can help them better navigate the process. In these ways, we can extend our insight and experience to students.

Perkins Coie is proud to sponsor and support several associations and career fairs that work to increase the diversity of the legal profession.

- Bay Area Diversity Career Fair
- Cook County Bar Association Minority Job Fair
- Hispanic National Bar Association Convention And Career Fair
- Impact Career Fair For Law Students And Attorneys With Disabilities
- Lavender Law Conference & Career Fair
- Microsoft Women & Minority Law Student IP Summit
- National Black Law Students Association Annual Convention and Career Fair
- National Diversity Pre-Law Conference & Law Fair
- Northwest Minority Job Fair
- Oregon Minority Job Fair
- Practicing Attorneys for Law Students Program, Inc.
- San Francisco Intellectual Property Law Association Bay Area Job Fair

MORE

Exhibit B



1L Opportunities

We have concluded 1L hiring for 2023. Please follow your law school's guidelines pertaining to the 2024 1L fellowship application timing.

1L Diversity Fellowship

Our firm is committed to the growth and development of legal communities that accurately reflect the rich diversity of our communities. Established in 1991, the fellowship provides 1L students who are members of groups historically underrepresented in the legal industry with a paid summer associate position and a \$15,000 stipend. Fellows who return for their 2L summer are eligible for an additional \$15,000 stipend at the conclusion of the summer program, as well as a \$10,000 award should they accept an offer to join the firm as an associate following graduation. There may be an opportunity for our 1L Diversity Fellows to work on-site with the legal department at our clients' offices. Generally, these are two-week opportunities during the summer.

The diversity fellowships are not tied to a specific practice group and may receive assignments from a variety of practices. These fellowships are available in the following Perkins Coie offices: Austin, Boise, Chicago, Dallas, Madison, New York, Phoenix, Portland, San Diego, San Francisco, Seattle, and Washington, D.C.

CRITERIA AND SUBMISSION GUIDELINES

Criteria

- Good standing as a first-year law student at an ABA-accredited law school.
- Demonstrated record of academic achievement and excellent writing and interpersonal skills, as well as experience that will contribute to a successful career in the legal field.
- A history of meaningful contributions to the diversity efforts of the student's law school and a strong desire to continue supporting diversity, equity, and inclusion efforts upon entering the legal profession.
- Membership in a group historically underrepresented in the legal profession, including students of color, students who identify as LGBTQ+, and students with disabilities.

Submission Guidelines

- Current resume.
- Cover letter.
- Undergraduate and, if available, law school transcripts (unofficial versions are acceptable).
- A legal writing sample (10-page maximum).
- A personal statement (one-page, single-spaced). The personal statement should be a narrative about the student's unique personal history and commitment to advancing diversity, equity, and inclusion within the community and legal profession.

1L Patent Litigation & Patent Prosecution Fellowships

Perkins Coie's 1L patent fellowships provide law students with a \$15,000 academic scholarship and a paid position as a 2023 summer associate with the firm. Patent fellowship recipients will be chosen based on their skills and experience as well as their demonstrated interest in practicing law in the specified field.

Perkins Coie's Intellectual Property practice combines the focus and flexibility of a boutique firm with the services of one of the world's leading technology law firms. We have more than 250 attorneys and agents who provide innovative, comprehensive counsel at every stage of IP protection and development, including patent litigation and appeals, post-grant proceedings, patent prosecution, portfolio counseling, and technology licensing, as well as copyright, trademark, trade secret, and unfair competition counseling and

litigation. Candidates for our Patent Prosecution or Patent Litigation Fellowships must have the technical or scientific background necessary for the practice group's work. Applicants with prior professional technical or scientific experience are preferred. Applicants for Patent Prosecution positions must be eligible to sit for the patent bar. The Patent Litigation Fellowship is available in our Austin, San Diego, and Washington, D.C., offices. The Patent Prosecution Fellowship is available in our Palo Alto and Seattle offices. A mixed Patent Litigation/Patent Prosecution Fellowship is available in our Seattle office only.

CRITERIA AND SUBMISSION GUIDELINES

Criteria

- Candidates must be first-year law students in good standing pursuing the degree of Juris Doctor at an ABA-accredited law school.
- Candidates must have a strong academic record as well as experience that demonstrates great promise for a successful career in the legal profession.
- Applicants for patent prosecution positions must be eligible to sit for the patent bar.

Submission Guidelines

- Current resume.
- Cover letter.
- Three references (name, email, and phone).
- Undergraduate and, if available, law school transcripts (unofficial versions are acceptable).
- A legal writing sample (10-page maximum).

1L Two Steps Ahead Scholars Program (Palo Alto only)

We have partnered with our client, Adobe, to create the Two Steps Ahead Scholars Program. This program provides a diverse first-year law student with the unique opportunity to spend part of the summer in Perkins Coie's Palo Alto office, and part of the summer in-house at Adobe's Silicon Valley headquarters. In addition to a paid summer position, program participants will receive a \$15,000 academic scholarship.

CRITERIA AND SUBMISSION GUIDELINES

Criteria

- Good standing as a first-year law student at an ABA-accredited law school.
- Demonstrated record of academic achievement and excellent writing and interpersonal skills, as well as experience that will contribute to a successful career in the legal field.
- A history of meaningful contributions to the diversity efforts of the student's law school and a strong desire to continue supporting diversity, equity, and inclusion efforts upon entering the legal profession.
- Membership in a group historically underrepresented in the legal profession, including students of color, students who identify as LGBTQ+, and students with disabilities.

Submission Guidelines

- Current resume.
- Cover letter.
- Undergraduate and, if available, law school transcripts (unofficial versions are acceptable).
- A legal writing sample (10-page maximum).
- A personal statement (one-page, single-spaced). The personal statement should be a narrative about the student's unique personal history and commitment to advancing diversity, equity, and inclusion within the community and legal profession.

Apply Here >

1L Summer Fellowships: Frequently Asked Questions

READ MORE

1. Which office should I apply to?

Perkins Coie's 1L Fellowship program is designed to recruit top-notch law students who may eventually begin full-time employment with the firm. To that end, you should only apply to the office in the city where you genuinely would like to live and start your practice as an entry-level attorney. *Candidates may apply to one office only for the Diversity Fellowship* but may apply for multiple fellowships in that office (for example, you may apply for both the Diversity Fellowship and the Patent Fellowship in one office if you qualify for both). *Candidates may apply to more than one office for the Patent Fellowship if they qualify for each.*

2. What does the firm consider "diverse"? Am I "diverse"?

Our definition of diversity is broad and encompasses students of color, students who identify as LGBTQ+, and students with disabilities. If you feel that you are diverse in one or more of these ways, please apply and share your unique story with us.

3. How important are law school grades?

As with any competitive process, undergraduate, graduate (if applicable), and law school grades are important evaluative factors. However, other factors, including a quality personal statement, relevant previous professional experience and ties to the area to which you are applying, are also weighed.

4. My law school grades won't be released by the application deadline. Can I still apply? What should I do?

This is a common occurrence. You can and should still apply. Please submit all other application materials by the application deadline and then follow up by providing your law school grades as soon as they become available.

5. What kind of writing sample should I provide?

The ideal writing sample demonstrates legal analysis and your writing ability. If you do not have a legal writing sample, please submit a writing sample that demonstrates your ability to summarize and analyze information and draw appropriate conclusions based on that analysis.

6. How important is the personal statement required for the 1L Diversity Fellowship? What role does my personal statement play in being selected?

A quality personal statement is essential to your application. An effective statement provides us with a sense of who you are, both as a candidate and as an individual. Your personal statement should be a narrative about your unique personal history and commitment to advancing diversity, equity, and inclusion within the community and legal profession.

7. When can I expect to be informed of the status of my candidacy?

You should expect to hear from the office(s) to which you applied regarding the status of your candidacy by late January.

What Our Summer Associates Say



"My summer at Perkins Coie was nothing short of an adventure. The level of access I had to associates, partners, and a challenging, yet exciting variety of assignments blew my mind. Everyone was incredibly kind, friendly, and approachable."

Yara Slaton, Former 1L Summer Associate



"Perkins Coie created a warm atmosphere for summer associates learning the ways of the law. I learned a great deal during my summer, and, most importantly, I never experienced any negative judgment for asking questions."

Junior Dufort, Former 1L Summer Associate

Exhibit C



2L Opportunities

We are now accepting **applications** for our 2024 2L Summer Associate Program.

Perkins Coie's summer associate program provides varied work and training opportunities as well as social events designed to promote interaction among summer associates, lawyers, and business professionals. Our summer associate program is our primary source of new associate hires.

Watch the Panel:

B4 OCI: Navigating the Interview Process

2L Summer Program

Perkins Coie participates in OCI at many schools across the country every year. Please check with your law school's career services or career development office to determine whether our firm participates at your school. If we do not participate at your school, please apply directly to us starting **June 1, 2023**.

2L Diversity Fellowship

As part of the firm's 2024 summer program and in support of our recruitment goals, Perkins Coie is pleased to offer a \$25,000 fellowship to 2L students who are members of groups historically underrepresented in the legal profession. This opportunity was created due to the success of our long-standing 1L Diversity Fellows program. The fellowship award will be paid in two installments: the first following successful completion of the summer program and the second upon accepting an offer to join the firm as a full-time associate. Students of color, students who identify as LGBTQ+ and students with disabilities are encouraged to apply.

CRITERIA, SUBMISSION GUIDELINES, AND FREQUENTLY ASKED QUESTIONS

Eligibility Criteria

- Good standing as a second-year law student at an ABA accredited law school.
- Demonstrated record of academic achievement, excellent writing and interpersonal skills, and experience that will contribute to a successful career in the legal field.
- A history of meaningfully contributions to the diversity efforts of their law school student body and a desire to continue their support of diversity, equity, and inclusion efforts upon entering the legal profession.
- Membership in a historically underrepresented group in the legal profession, including students of color, students who identify as LGBTQ+, and students with disabilities.

Submission Guidelines

Students applying directly to the firm (not through an on-campus interview program) should apply through our website and include a personal statement with their application to be considered for the fellowship. Separately, students who participate in our on-campus interview program and are selected for a callback interview will be asked to submit a personal statement at that time. Personal statements should be a one-page, single-spaced narrative about the student's unique personal history and their commitment to advancing diversity, equity, and inclusion within their community and the legal profession.

Frequently Asked Questions

- *Which office should I apply to?*

Perkins Coie's 2L Fellowship program is designed to recruit top-notch law students who may eventually begin full-time employment with the firm. To that end, you should only apply to the office in the city where you genuinely want to live and start your practice as an entry-level lawyer.

- *What does the firm consider "diverse"? Am I "diverse"?*

Our definition of diversity is broad and encompasses students of color, students who identify as LGBTQ+, and students with disabilities. If you feel that you are diverse in one or more of these ways, please apply and share your unique story with us.

- *How important are law school grades?*

As with any competitive process, undergraduate, graduate (if applicable), and law school grades are important evaluative factors. However, other factors, including a quality personal statement, relevant previous professional experience, and ties to the location for which you are applying, are also weighed.

- *My law school grades won't be released by the application deadline. Can I still apply? What should I do?*

This is a common occurrence. You can and should still apply. Please submit all other application materials by the application deadline and then follow up by providing your law school grades as soon as they become available.

- *How important is the personal statement to my application for the 2L Diversity Fellowship?*

A quality personal statement is essential to your application. An effective statement provides us with a sense of who you are, both as a candidate and as an individual. Your personal statement should be a narrative about your unique personal history and commitment to advancing diversity, equity, and inclusion within the community and legal profession.

Apply Here >

Perkins Coie seeks summer associates who have demonstrated academic excellence, leadership in and service to the community, and dedication to excellence in the legal profession. All candidates must be enrolled in and in good standing at an ABA-accredited law school.

What Our Summer Associates Say

BEST EXPERIENCE

"I had previously worked at another law firm and in a public interest position. My summer at Perkins Coie blew both of those experiences away"

- FORMER SUMMER ASSOCIATE

HELP SET LEGAL PRECEDENT

"I had the opportunity to provide analysis for one of the world's biggest tech companies. The law was 10 steps behind the technology so I had to find new sources to supplement my traditional legal research."

- FORMER SUMMER ASSOCIATE

Exhibit D



Law Students

The 2024 2L Summer Associate Program is now accepting **applications**. Please visit our **2L opportunities** page for more information about our 2L Diversity Fellowship and 2L Summer Program.

Perkins Coie's summer associate program provides varied work and training opportunities as well as social events designed to promote interaction among summer associates, attorneys and staff.

Our summer associate program is our primary source of new associate hires. We principally recruit second-year law students and occasionally hire pre-clerkship third-year law students for our domestic offices.

The associate's journey at Perkins Coie begins with an extensive orientation, training, and mentorship program designed to integrate new associates into our firm and instill in them our values. Training is often hands-on: unlike many large law firms, we expect our associates to accept significant responsibility early in their law firm careers. We are not highly leveraged, which means that associates receive significant direct client and partner contact and many opportunities to assume leadership roles within the firm.

[Learn More About Our Summer Program >](#)

Life as a Summer Associate

Summer associates work on a wide range of challenging legal assignments similar to those given to new associates, which typically include legal research, analysis and drafting.



Top Ranked Law Firm in Vault

Perkins Coie has been listed in the Vault Top 100 for 14 consecutive years, moving up again this year. [Read our Vault profile here.](#)

[VIEW MORE RECOGNITION](#)

One Firm Culture

Among the factors contributing to Perkins Coie's success are a strong emphasis on service that starts at the top of the firm and permeates throughout, and a collegial culture that emphasizes collaboration in support of client needs. We have created a firm culture that is based on core values, including mutual respect and cooperation, and a commitment to serving our clients. In recognition of this, we have been named among *Fortune* magazine's "100 Best Companies to Work For" for 20 consecutive years, from 2003 to 2022.

We aim to be the most trusted advisor to the world's most innovative companies and industry leaders, accomplishing this through a "one firm" culture that reflects a deep dedication to our clients, our communities, and each other. We expect that our associates will collaborate across practices and offices to provide our clients the best possible legal services.

[Apply Here >](#)

B4 OCI: Navigating the Interview Process



The interviewing season for second-year law students can be daunting and we want to help you navigate it successfully. Our panel of partners and recruiting professionals shared their tips and suggestions with a particular focus on preparing for interviews—both OCI and callback interviews—and then navigating those interviews and the post-interview process.

[WATCH THE PANEL](#)

Preparing for the Future

- [Optimizing Your Summer & Your Future Employment Opportunities](#)
 - [Developing Your Future Network](#)
 - [Writing Your Best Possible Resume](#)
 - [How to Choose the Right Firm for You](#)
 - [Ten Steps to Effective Informational Interviewing](#)
 - [Using a Legal Secondment to Sharpen Your Skills and Advance Your Career](#)
-

Videos

- [Diverse Voices](#)—Listen to diverse attorneys candidly discuss what it is like to work—and succeed—in BigLaw.
- [Optimizing Your Summer and Future Employment Opportunities](#)—Our speakers offer concrete advice on how you can use your time this summer to become the “preferred candidate” employers describe in their job postings.

Exhibit E



About our Summer Program

We are now accepting **applications** for our 2024 2L Summer Associate Program.

As a Perkins Coie Summer Associate, you get to:

Work - Hands-on legal experience.

Learn - Mentored by partners and associates, training and feedback.

Have Fun - Social events and networking opportunities.

Explore Opportunities:

[1L Opportunities >](#)

[2L Opportunities >](#)

Work Assignments

Summer associates work on a wide range of challenging legal assignments similar to those given to new associates, including legal research, analysis and drafting.

At Perkins Coie, our summer associates can look forward to the freedom of selecting work assignments in different practice areas available at each office location. Assignments include (but are not limited to) projects related to the following practice areas:

- Business Litigation
- Corporate and Securities
- Intellectual Property
- Privacy and Data Security
- Product Liability
- Real Estate and Land Use
- Technology Transaction & Privacy
- Trademark, Copyright, Internet & Advertising

Summer "Trackers"

Attorney "trackers" coordinate work assignments and monitor the type, quality and amount each summer associate receives. Summer associates are also encouraged to seek out assignments directly from senior associates and partners.

Supervising attorneys provide informal feedback to summer associates after each assignment, and they submit written, formal evaluations to the office hiring committee. The formal evaluations become part of each summer associate's mid-summer and final evaluations.

Professional Development

Summer associates are commonly invited to attend depositions, mediations, deal closings, client meetings, trials, and other professional activities and events. They have the opportunity for both informal and formal training. Formal training includes monthly CLE programs on specific practice area topics. Summer associates can also accompany attorneys to networking events, court hearings, real estate and corporate transaction closings and client meetings. Finally, summer associates are assigned mentors who ensure their integration to the firm, answer their many questions and generally guide their progress and development throughout the summer.

Pro Bono Involvement

Summer associates can work on pro bono matters. At the beginning of every summer, a local legal aid organization presents an in-office training program and then pairs interested summer associates with firm attorneys to work on available pro bono cases.

Diversity

Summer associates are invited to attorney affinity group meetings, including our attorneys of color, women, LGBTQ+ and parents groups, as well as to diversity events and dinners sponsored by the firm. For a list of past events sponsored by the firm, please visit our Diversity Sponsorships page.

Sustainability

Our local Green Committee collaborates with the firmwide committee to develop and implement sustainability practices for the office and for individuals. In addition to paper, plastic, metal and glass recycling, we also offer battery, cell phone and used office supply recycling. The office offers incentives to those who choose to ride public transportation and encourages employees to participate in community events like "Bike to Work Week."

Exhibit F

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

AMERICAN ALLIANCE FOR
EQUAL RIGHTS,

Plaintiff,

v.

PERKINS COIE LLP,

Defendant.

Case No. 3:23-cv-01877-L

DECLARATION OF EDWARD BLUM

I, Edward Blum, declare as follows:


1. I am over the age of 18, of sound mind, and otherwise competent to sign this declaration.
2. I am the President of the American Alliance for Equal Rights.
3. The Alliance is a nationwide membership organization dedicated to challenging distinctions and preferences made on the basis of race and ethnicity.
4. AAER's members are harmed by racially exclusionary programs like Perkins Coie's 1L and 2L diversity fellowships. These fellowships exclude some of the Alliance's members because of their race.
5. The Alliance has at least one member who is ready and able to apply to the 2024 class of the 1L Diversity Fellowship and the 2025 class of the 2L Diversity Fellowship, but cannot because they are the wrong race—including Member A.
6. Through the Alliance, I know Member A, have learned his background, and have discussed his plans and intentions.

7. I have witnessed firsthand the retaliation that individuals can receive for bringing litigation challenging racial preferences. For example, I supported Abigail Fisher in her challenge to affirmative action in *Fisher v. Univ. of Texas at Austin*, 570 U.S. 297 (2013), and *Fisher v. Univ. of Texas at Austin*, 579 U.S. 365 (2016). Ms. Fisher “endured consistent harassment since 2008” as “a direct result of [her] involvement in that case.” *SFFA v. Harvard Coll.*, No. 1:14-cv-14176 (D. Mass. Apr. 29, 2016), ECF 150-4 ¶3. She experienced “threats” and “insults” from across the country, and she suffered professionally. *See* ¶¶5, 9-10. Ms. Fisher explained that these experiences “often led [her] to second-guess [her] involvement in the case and as an advocate against unlawful affirmative action policies.” ¶11.

8. Based on my experience and discussions with many individuals, I believe many students would not challenge programs like Perkin’s diversity fellowships—or join organizations like the Alliance—absent anonymity protections.

9. Per 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2023



A handwritten signature in black ink, appearing to read 'Ed Blum', is written over a horizontal line.

Edward Blum
President of American Alliance for
Equal Rights

Exhibit G

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

AMERICAN ALLIANCE FOR
EQUAL RIGHTS,

Plaintiff,

v.

PERKINS COIE LLP,

Defendant.

Case No. 3:23-cv-01877-L

DECLARATION OF MEMBER A

I, Member A, declare as follows:

1. I am over the age of 18, of sound mind, and otherwise competent to sign this declaration.
2. I would like to apply to Perkins Coie's 1L diversity fellowship in 2024 and 2L diversity fellowship in 2025. I meet all the eligibility requirements set by Morrison, except I am heterosexual, white, and not disabled.
3. I am currently a first-year law student in good standing at a highly-ranked and well-regarded ABA-accredited law school. Perkins has previously hired associates from my school.
4. I am a U.S. citizen.
5. If allowed to apply, I believe my application would show a demonstrated record of academic achievement, excellent writing and interpersonal skills, and experience that will contribute to a successful career in the legal field. In college, I maintained a high GPA while holding leadership positions in my fraternity and a debating society.

Then, as a long-time paralegal, I worked at several law firms assisting immigrants and a national nonprofit assisting religious minorities. I also did extensive writing and worked closely with clients and colleagues of all backgrounds.

6. My work, experiences, and views have set me up to meaningfully contribute to the diversity efforts of my law school, and I have a strong desire to continue supporting diversity, equity, and inclusion efforts upon entering the legal profession.

7. I am interested in applying to the fellowships because they are prestigious programs that would provide me with great professional opportunities. I would benefit greatly from working at Perkins next summer and making professional connections and finding mentors through these fellowships.

8. My first preference—where I would apply if Perkins were ordered to stop racially discriminating—is Perkins' office in Dallas. I would like to live and work in Dallas as an entry-level attorney. I have friends who strongly endorse living there, and I enjoy visiting Texas. My wife and I rank it as one of the top places we would like to move after I finish law school.

9. I am also drawn by the fact that, as a mere 1L, I can earn tens of thousands of dollars, plus stipends, and be put on a track to eventual employment at a firm that starts associates at \$190,000/year. I would use the money I earn at the fellowships to pay living expenses and the cost of daycare for my daughter. I would also pay off student debt and avoid further debt while in school.

10. I am able and ready to apply to the 2024 class of the 1L fellowship and the 2025 class of the 2L fellowship if a court orders Perkins to stop racially discriminating.

11. If I get accepted and join the fellowships, I am prepared to meet the programs' requirements and expectations.

12. If a court orders Perkins to stop racially discriminating, I would assemble and promptly submit all the requested application materials, including my law-school grades once they become available.

13. I became a member of the American Alliance for Equal Rights because I support its mission as well as this lawsuit.

14. I am signing this declaration under a pseudonym because I am a law student and, if my participation in this litigation becomes public, I fear reprisal from other students on campus, my professors, future employers, and the public. I also fear that Perkins would hold my involvement against me when selecting fellows.

15. Per 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2023

Member A
Member A